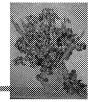


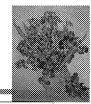
Overview



Suggested topic: Your experience and vision/ approaches to ensure success for the IRIS program

- Some experiences at IARC
- Approaches necessary for the success of IRIS
 - Adopt systematic review
 - Increase public engagement
 - Work through disciplinary workgroups
- Vision for the future

When I Arrived at IARC, They Had Been Under Fire



THE LANCET



It only needs the perception, let alone the reality, of financial conflicts and commercial pressures to destroy the credibility of important organisations such as IARC and its parent, WHO.





Policy Watch

Transparency in IARC Monographs





The joint announcement made by *The* Lancet Oncology and IARC in this issue is an important step towards restoring trust in the way that results of studies done by publicly funded agencies are both prepared and reported. The issues encountered by IARC are certainly not unique and we hope that this joint initiative will serve as a model for other health agencies. Because the Monograph programme has wide-ranging and vital publichealth implications, The Lancet Oncology commends IARC in the way in which it has responded to criticism, and are pleased to have been given this opportunity to help improve transparency in IARC's flagship initiative.

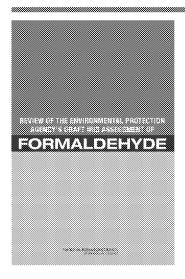
David Collingridge Editor, The Lancet Oncology, London

ED_002435_00003558-00004

Increased transparency in IARC Monograph programme

An Alarm Bell for IRIS



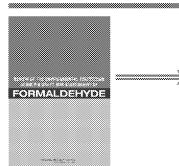


- "...recurring methodologic problems"
- "...problems with clarity and transparency of the methods appear to be a repeating theme over the years, ..."
- "... the draft was not prepared in a consistent fashion; it lacks clear links to an underlying conceptual framework; and it does not contain sufficient documentation on methods and criteria..."

-p 4

The NRC's "Roadmap for Revision": Adopt Systematic Review

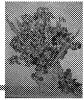


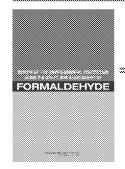


"... there are numerous examples of systematic approaches to hazard identification, including the monographs on carcinogenicity of the International Agency for Research on Cancer and the National Toxicology Program."

– p 160

The NRC's "Roadmap for Revision": Adopt Systematic Review



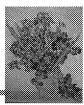


"... there are numerous examples of systematic approaches to hazard identification, including the monographs on carcinogenicity of the International Agency for Research on Cancer and the National Toxicology Program."

– p 160



Each Monograph Has an Overview, **Evidence Tables and Synthesis**



Chromium (VI) compounds

workers at the hydronic good show workshift to the handless and the beginning and a six of trees seek that the beginning and a six of trees seek that the first the beginning and a six of trees seek that the first the beginning and a six of trees seek that the beginning and the six of the seek that the seek th

A Cancer in Humans

2. Cancer in Humans

2. I Introduction

3. App method of controports dating to the fact production of the control of the

Based on review of the previous Monograph and subsequent epidemiology, focus on

- Nose and nasal sinus
- Stomach (due to recent controversy)

At least 50 studies could be informative . . . A minority contain measures of Cr VI exposure . . . The studies were triaged:

- 1. Workers highly likely to be exposed to relatively high levels: chromate production, chromate pigment production, chromium electroplating.
- 2. Workers possibly exposed to relatively high levels: stainless steel welders.
- 3. Workers exposed with lower likelihood, frequency, or concentration: ferrochromium and stainless steel production, mild steel welding, general paint production, general spray painting, tanneries, gold mining, nickel plating.

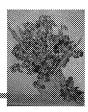
Studies in category 3 not included because there were sufficient studies in categories 1 and 2.

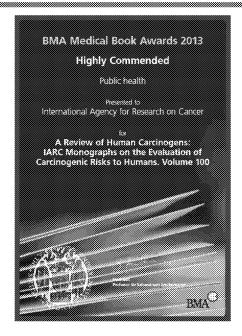
Each Monograph Has an Overview, Evidence Tables and Synthesis



Anthor daw Phor	Ultra creci e rizables e-f Lices evi	Паражетя 2 окторня в	C4000 80 808 E2	Ецианию Сисанту	·	Network State	98% CT	bedergespas streg aspecases gilibras, signesses
Hausen, r. al. (1816) Beranark	10 193 we have, a minkers were agriculture, and other react for artism three 24 one if they composition, early layed 1,004—641; do librour, 1938—66	Maile Copenario, Lorino nas Bildress Georgalista, acid non absolute di úcia ag heckura, 85% 	Coherr partly for find of in 5 skineste of alg. Breake for acids are all realists of the real should be come also not bully others.	A (155 m) lices	7.1	1.19	0.75-1.79	SSIII rof Jamasek
Lagrace, 216 Hanne (1996) Dengstek	Newtoburger untuit of Mini- sulant of \$3.372 on pesulants of the Community 1.856 entering \$1.850 posters brain occurring 1.916-80, 438 comming	Or mension and empiring travery based on resided quantities since	Uniniapo unti trien co el el giato end u en Senonete el el 1991 Rendin Se ende escluciónes etracolabertos esconos	ABS3 veiten	26	3.5	8.8-CB	UA ఇక్కే ఉంది. దీర రాగుపి కొట్ట
Mikerador, pri si (1966) Miniki ugina made	14. Marrengo de Premero. et ist. o 6 month le espectue to Cy VII en sphilyer (1910) 181 and followed (1911) 184	induminal lengtimes data and one's laboury menulos, arallelele for all comes of the study		4 Horanten	. 3	u s	114-12	MA real Paged Sound.
				19.5 = 181.7 obursányinen	7	11	03-25	SCR 146 Pogo Sorná
Dükster-Strift cial (1937) Smatten	28.1 styliskers sam forefrege Nord 5 of Killstyd 20 og jætler, magslegeni in 5 ynams 1950 – 55, follhome 1962 –44.2	Victorianshat, ign		Mightengrouse is CVC	ŧ	1.61	fa 607.58	SPAR OLF WAREE
Biu Euwern, er al 1997) Ivan brad	1) T2 icenset ware manace. Damo Fer I 350 endlaker in 1955; folkered 1959-49		to sure elevers steel for backs present maniformation Unit's social real messers force severage in Unit's 100 or severage in Unit's	A Burn by s	29	<i> 1</i> 4	1 04-2 16	El Vicer hastered

" . . . an authoritative statement from an authoritative body."

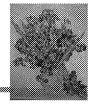




"This is an important resource in that it defines the current state of evidence-based thinking on cancer causing agents. It . . . meets its objectives very well and is an authoritative statement from an authoritative body."

- British Medical Association, 2013

Another Alarm



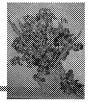
"EPA science is on the rocks."

"You can't fail this time."

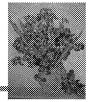








- Our assessments are regarded as "an authoritative statement from an authoritative body"
- IRIS is the "Encyclopedia of environmental health hazards"
- [Become the company most known for changing the worldwide image of Japanese products as being of poor quality. Made in Japan will mean something fine and not shoddy – Akio Morita]

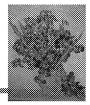


accurate

best-ofits-kind

trusted

Authoritative



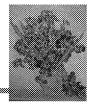
accurate

best-ofits-kind

comprehensive

trusted

Authoritative Encyclopadic



accurate improved science

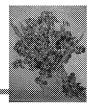
transparent

best-ofits-kind

comprehensive productive

trusted

Authoritative Encyclopedic "Enhancements"



accurate improved science credible

transparent transparent

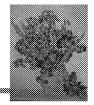
best-ofits-kind

comprehensive productive

trusted

Authoritative Encyclopedic "Enhancements" Thomas Burke inclusive

Systematic Review



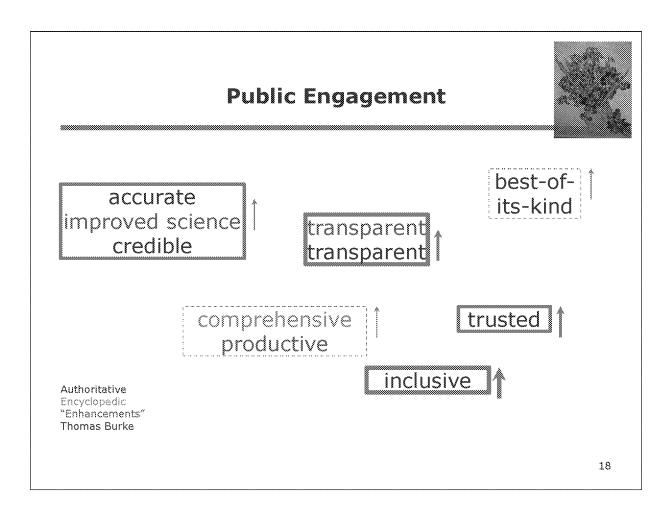
accurate improved science credible

transparent transparent best-ofits-kind

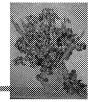
comprehensive productive

trusted

Authoritative Encyclopedic "Enhancements" Thomas Burke inclusive



Consistent Peer Review



accurate improved science credible

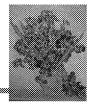
transparent transparent best-ofits-kind

comprehensive productive

trusted

Authoritative Encyclopedic "Enhancements" Thomas Burke inclusive

Disciplinary Workgroups



accurate improved science credible

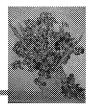
transparent transparent best-ofits-kind

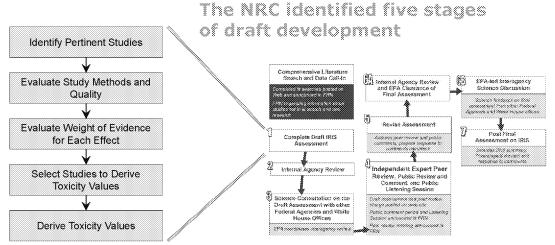
comprehensive productive

trusted

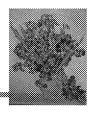
Authoritative Encyclopedic "Enhancements" Thomas Burke inclusive

First Wave of Improvements: Adopting Systematic Review

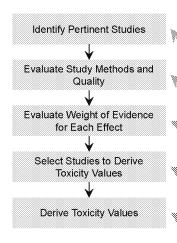




A New Preamble Explains How Assessments are Developed

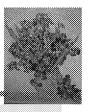


Preamble to IRIS Toxicological Reviews



- 1. Scope of the IRIS Program
- 2. Process for Developing and Peer-Reviewing IRIS Assessments
- 3. Identifying and Selecting Pertinent Studies
- 4. Evaluating the Quality of Individual Studies
- 5. Integrating the Overall Evidence of Each Effect
- 6. Selecting Studies for Derivation of ToxicityValues
- 7. Deriving Toxicity Values

IRIS documents are becoming clear, concise, and systematic



Old structure

- Introduction (1/2 page)
- Literature search (1 page)
- Lengthy study summary narratives (all studies, many pages, detailed descriptions)
- Combined section with hazard identification and dose-response

Standard assessment: 300 pp Complex assessment: 1000 pp

· New structure

- Preamble (15 pages)
- Detailed literature search strategy
- Evidence tables of key studies for each adverse effect
- · Identification of health hazards
- Toxicity values for each health hazard

· Standard assessment: 100 pp

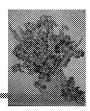
· Complex assessment: 200 pp

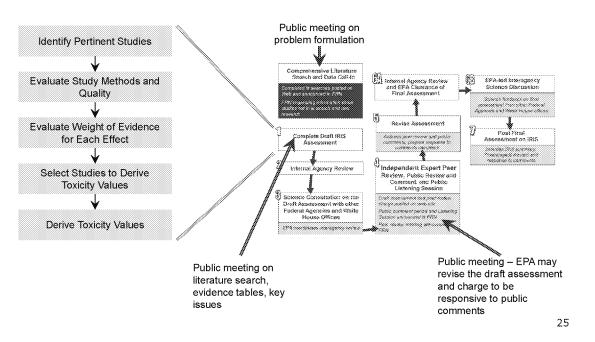
Simultaneously, New Science Content Has Been Added



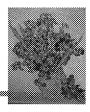
- Hazard section to identify credible health hazards
 - Weight-of-evidence categories for noncancer effects will be evaluated after the NRC's advice in June 2014
- Toxicity values are explored for each credible health hazard
 - This will facilitate subsequent cumulative risk assessments that consider the combined effect of multiple agents acting at a common site or through common mechanisms

Second Wave of Improvements: Increasing Public Engagement



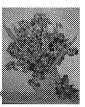


Second Wave of Improvements: Frequent Scientific Workshops



- Recent workshops
 - Systematic review (Aug 2013)
 - Hexavalent chromium (Sept 2013)
- Upcoming workshops
 - Mouse lung tumors (Jan 2014)
 - Formaldehyde (TBD)
 - Issues for endogenous chemicals (TBD)
- Preparations include a public call for topics and speakers
- Webinar format enhances public access

Second Wave of Improvements: Bringing Assessments to Completion

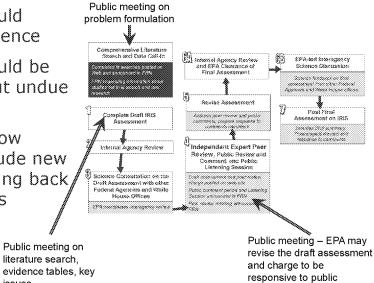


Two conflicting ideals:

- Assessments should reflect current science
- Assessments should be completed without undue delay

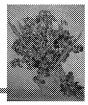
"Stopping Rules" allow assessments to include new studies without cycling back, through earlier steps

issues

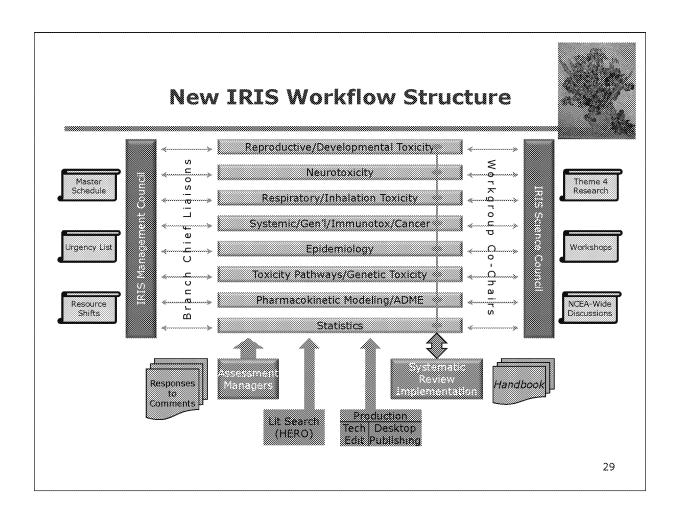


comments

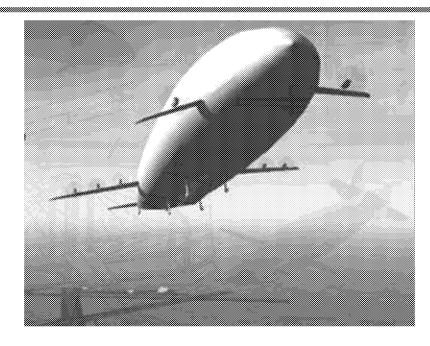
New Internal Workflow for Draft Development



- Disciplinary Workgroups will do most analysis and writing
- IRIS Science Council
 - Represents all assessment disciplines
 - Addresses major science issues
 - Identifies topics for workshops or further research
- IRIS Management Council
 - Represents all management levels across four divisions
 - Maintains Master Schedule of assessments
 - Maintains Urgency List of assessments
 - Shifts resources across assessments and workgroups







Good for the Program; Good for Career Development



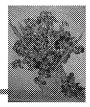
GOOD for the Program

- Increased consistency across program
- Fewer "units" to manage
- Ability to identify critical personnel needs and target relief to those areas
- Structure to bring in scientists on a short-term or part-time basis

GOOD for Career Development

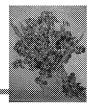
- Broader experience see many more assessments
- Learn from others in the same field
- Increased opportunities to write papers
- Increased opportunities to manage work, run meetings, learn to build consensus

IRIS Mission

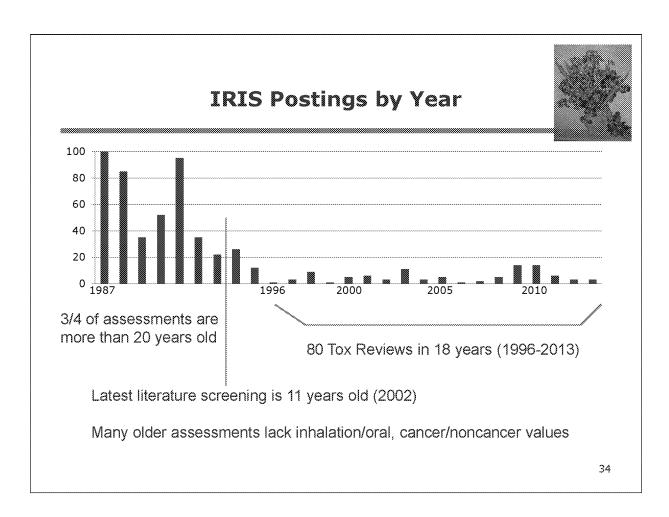


- To develop Tox Reviews
- that the scientific community regards as authoritative
- with full public participation

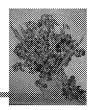
Enhancements to IRIS



- IRIS is making changes to
 - Improve the fundamental science
 - Improve the productivity of the program
 - Increase transparency so issues are identified and debated early
- These changes span three broad areas
 - Use of systematic review methods
 - Enhancements to the 7-step IRIS process
 - New internal workflow for draft development

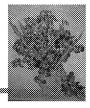


Objectives of the New IRIS Enhancements



- To improve the fundamental science
 - by adopting the principles of systematic review
 - by strengthening peer review
- To increase productivity to better meet stakeholder needs
- To increase transparency so issues are identified and debated early

Some Challenges for 2014



- Increase productivity
 - Since 1996, 4-5 assessments/year
 - We expect to triple productivity within 2-3 years
- Begin implementation of Problem Formulation
 - Coming soon in early 2014!
- Implement a new internal workflow to better achieve IRIS's objectives of improved science and increased productivity



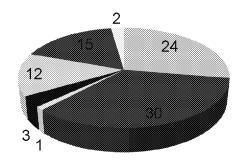


Some future initiatives

Ensuring Success:Make Public Meetings More Inclusive



Affiliations of attendees for Dec 2013



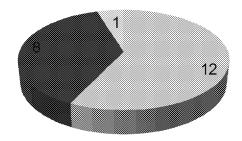
■ Academia

■ State/Local/Tribal gov't

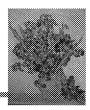
- NGOs
- Other federal gov't
- ... Other lederal gov
- Media

Plus 76 from EPA

Affiliations of speakers for Dec 2013

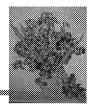


- **NGOs**
- Media
- **■** Consultants
- Academia
- State/Local/Tribal gov't



OLD MEETING FORMAT

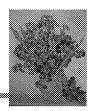
- Assessment A
 - Speaker 1
 - Speaker 2
- Assessment B
 - Speaker 1
 - Speaker 2 (yields to Speaker 1)
 - Speaker 3 (yields to Speaker 1)
 - Speaker 4 (yields to Speaker 1)
- Assessment C
 - Speaker 1
- General comments



D MEETING FORMAT

- ssessment A
 - **R**peaker 1
 - eaker 2
- Assessment B
 - Speak
 - Speaker (yields to Speaker 1)
 Speaker 3 (yields to Speaker 1)
 Speaker 4 (yields to Speaker 1)
- Ass ssment C
 - Speaker 1
 - General comments

We can do better!

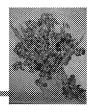


NEW MEETING AGENDA

- Assessment A
 - Issue 1
 - Issue 2
 - Issue 3
- Assessment B
 - Issue 1
 - Issue 2
- Assessment C
 - * Issue 1
 - Issue 2
- Open forum & discussion

STEP 1. 2-4 months before a meeting:

- Post preliminary agenda based on issues
- Post materials for each assessment



NEW MEETING AGENDA

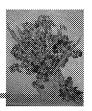
- Assessment A
 - Issue 1
 - Issue 2
 - Issue 3
- Assessment B
 - Issue 1
 - Issue 2
- Assessment C
 - Issue 1
 - Issue 2
- Open forum & discussion

STEP 1. 2-4 months before a meeting:

- Post preliminary agenda based on issues
- · Post materials for each assessment

STEP 2. Up to 1 month before the meeting:

- Receive public requests to speak on issues
- Encourage scientific experts and underrepresented sectors to nominate themselves
- Receive suggestions for additional issues



NEW MEETING AGENDA

- Assessment A
 - * Issue 1
 - Issue 2
 - Issue 3
 - Issue 4
- Assessment B
 - Issue 1
 - Issue 2
- Assessment C
 - Issue 1
 - Issue 2
 - Issue 3
- Open forum & discussion

STEP 1. 2-4 months before a meeting:

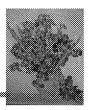
- Post preliminary agenda based on issues
- · Post materials for each assessment

STEP 2. Up to 1 month before the meeting:

- Receive public requests to speak on issues
- Encourage scientific experts and underrepresented sectors to nominate themselves
- · Receive suggestions for additional issues

STEP 3. Up to 1 month before the meeting:

 Find a speaker for any issue where scientific expertise or balance is lacking



NEW MEETING AGENDA

- Assessment A
 - Issue 1 speakers
 - Issue 2 speakers
 - Issue 3 speakers
 - Issue 4 speakers
- Assessment B
 - Issue 1 speakers
 - Issue 2 speakers
- Assessment C
 - Issue 1 speakers
 - Issue 2 speakers
 - Issue 3 speakers
- Open forum & discussion

STEP 1. 2-4 months before a meeting:

- Post preliminary agenda based on issues
- Post materials for each assessment

STEP 2. Up to 1 month before the meeting:

- Receive public requests to speak on issues
- · Encourage scientific experts and underrepresented sectors to nominate themselves
- · Receive suggestions for additional issues

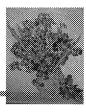
STEP 3. Up to 1 month before the meeting:

 Find a speaker for any issue where scientific expertise or balance is lacking

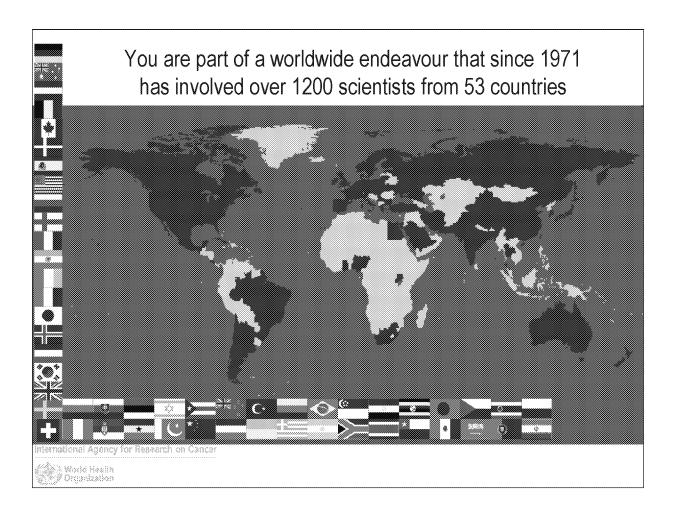
STEP 4. A few days later:

Post timetable and speakers' names

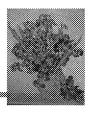
Ensuring Success: Involve 200 Scientists over the Next 5 Years



- Workshops
- Bimonthly public meetings
 - In April, begin to involve unaffiliated academics
- Disciplinary workgroups



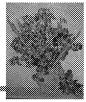
Ensuring Success: Complete Assessments; Keep Them up to Date



Consider these scenarios . . .

- Pressure increases to re-examine the developmental effects of trichloroethylene
- NCI updates its epi study as the acrylonitrile assessment is about to be posted
- NTP announces it will undertake a chronic inhalation study for PCBs
- New studies contribute substantially to knowledge about mechanistic pathways for formaldehyde-induced leukemia

These Have a Common Solution: Modular Assessments



- Front matter
- Hazard identification
 - Cancer
- Reproductive toxicity
- Neurotoxicity
- Immunotoxicity
- Hepatotoxicity
- Dose-response analysis

46.....

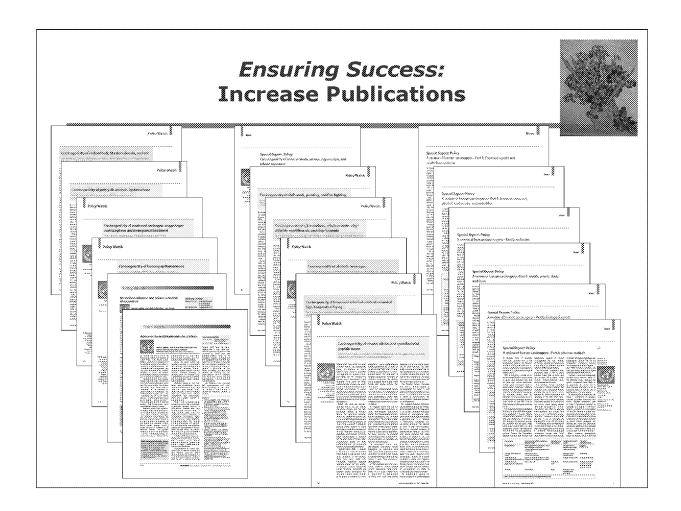
- Organ/system RfDs
- Overall RfD
- Organ/system RfCs
- Overall RfC
- Cancer slope factor
- Cancer unit risk

- *A new neurotoxicity study?
- Update just these sections:
 - Neurotox lit search
 - Neurotox evidence tables
 - Neurotox RfD
 - Overall RfD (possibly)
 - and the revision dates for these sections

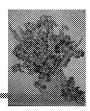
How Modular Assessments Could Work



If	Then
Pressure to re-examine developmental effects of trichloroethylene	Re-do only the developmental hazard and developmental toxicity values
NCI updates epi study as acrylonitrile assessment is about to be posted	POST the assessment; re-do cancer sections when study is published
NTP announces it will undertake a chronic inhalation study for PCBs	FINISH the oral assessment; add inhalation hazard and RfC later
Mechanistic pathway for formaldehyde-induced leukemia	FINISH rest of the assessment; then update the leukemia section



We Already Have an Agreement with EHP to do this



TOURISM in revenue and the control of the control o

Selfan in which is a CEC and a children in C

Ondoor read Today Responses - years 121 years 114 year 200

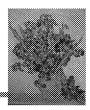
Other manuscripts are drafted

- Perc
- Methylene chloride

Let's do this also for

- Workshops
- Disciplinary issues
- Some issues from bimonthly public meetings

In Time, We Can Publish Authoritative Reviews



Side in consequences of the second of the se

Vision James Diagnos, Frame Foot, Carl Soci, Exercitivous, Business Ladir, Germania, Franka Di Charansia, Nembra Ladir, Carl Soci, Ladir, Carl Soci, Carl

obtainable de Belandrous of doutre et operate alors a expoderate assert amend parcent, consocrate destructures of the consocrate and the consocrat

Control Company State Company of State Company

Desert Trailer assert Rosses, not her western often attent stable concept on proceeding of the care of a ready of the desert of a second concept of the care of the care of the care of the care of an all properties. It is also stable to an interface of proceeding for the care of the ca

Conside, the Discovered approved the designed on Consideration of Consideration (Consideration Consideration Consi

The desired of the LEACT, received an experience of the content of

treates model production described by Continuous and produced to the continuous and produced to the continuous and the continuo

Mostocke

For each agent from Italia Charlette protein respective interactive controlled base of the controlled account from the orbit in the inter-indicated account of the controlled account from the protein on account from the protein on the controlled account from the protein on the controlled account from the protein on the controlled account from the controlled account for the controlled account from the controlled account

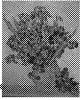
neiranja or coneg

NO: Barrass 124

Imagine IRIS publishing . . .

- Environmental causes of human neurotoxicity
- Environmental causes of reproductive toxicity
- Environmental causes of emerging diseases
- etc

Good for the Program; Good for Career Development



GOOD for the Program

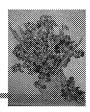
- Increased dissemination of IRIS findings and views
- Perceived endorsement by top scientific journals
- Increased recognition of IRIS as a scientific program
- Increased reputation of IRIS scientists
- Increased credibility of assessments
- Increased ability to attract new talent

GOOD for Career Development

- More publications
- More invitations to scientific meetings
- More interaction with the scientific community
- Enhanced scientific reputation

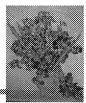
. . . TQB

Ensuring Success:Continuity during Election Years



- Consider
 - Scientific journals published by NIH institutes
 - Monthly Unemployment Rates and Consumer Price Index from the DOL/BLS
- Why can't IRIS be like that?
- Ensuring success
 - Achieve authoritative status
 - Achieve regularity of outputs
 - Scientific oversight independent of politics

Ensuring Success:Partner with Other Federal Agencies

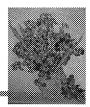


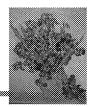
A Mark of Success: Leaving the GAO's High-Risk List



2008	Low productivity	
	OMB-led interagency review $\underbrace{GAO}_{\text{Accountability - integrity - Red}}$	ability
2011	Continued low productivity	
	Unaddressed issues with clarity and transparency of assessments	
	Outdated information on status of ongoing assessments	
2013	No recent evaluation of needs for IRIS assessments	
	Need for criteria for selecting chemicals for assessment	
2009	High-risk area needing broad-based transformation to address major economy, efficiency, or effectiveness challenges	
	**	56

How Does IRIS Get Off the GAO's High-Risk List?





QUESTION: Are we the sole arbiters of our guidelines?

OR

Can we accept peer review advice on how to interpret data relative to our guidelines?

Our Guidelines Envision Flexibility



"In summary, one objective of the RfC methodology is that it always be scientifically based, and thus, the methodology should be considered dynamic." [RfC methodology, 1994]

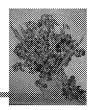
"In particular, the Guidelines emphasize that risk assessments will be conducted on a case-by-case basis, giving full consideration to all relevant scientific information. This approach means that Agency experts study scientific information on each chemical under review and <u>use the most scientifically</u> appropriate interpretation to assess risk." [Neurotoxicity guidelines, 1998]

"EPA cancer risk assessments may be conducted differently than envisioned in the cancer guidelines for many reasons, including (but not limited to) new information, new scientific understanding, or new science policy judgment. The science of risk assessment continues to develop rapidly, and specific components of the cancer guidelines may become outdated or may otherwise require modification in individual settings. Use of the cancer guidelines in future risk assessments will be based on decisions by EPA that the approaches are suitable and appropriate in the context of those particular risk assessments. These judgments will be tested through peer review, and risk assessments will be modified to use different approaches if appropriate." [Cancer guidelines, 2005]

"Where EPA does use the approaches in the Supplemental Guidance in developing risk assessments, it will be because EPA has decided in the context of that risk assessment that the approaches from the Supplemental Guidance are suitable and appropriate. This <u>judgment will be tested through peer review</u>, and the risk assessment will be modified to use different approaches if appropriate."

[Early-life exposure guidance, 2005]

[Emphasis added in all quotations]



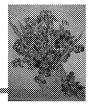
QUESTION: In each year, would we rather complete

4 assessments that satisfy us

OR

20 assessments that satisfy the scientific community?

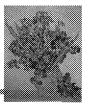
Ensuring Success for IRIS



- Make public meetings more inclusive
- Involve 200 scientists over the next 5 years
- Complete assessments; keep them up to date
- Increase publications
- Partner with other federal agencies

We're on a good path . . .
Thank you for your commitment

Summary of the IRIS Enhancements



Improved science

- IRIS has adopted systematic review
- New Hazard section identifies all credible health hazards
- Toxicity values are explored for each credible health hazard
- Peer review has been strengthened

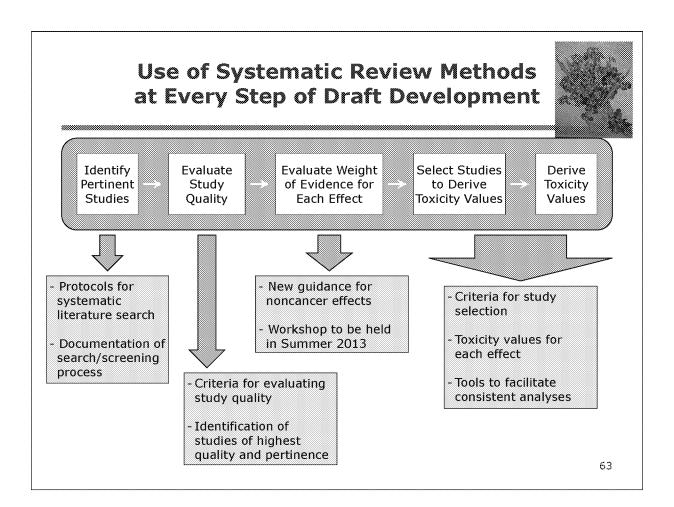
Increased transparency

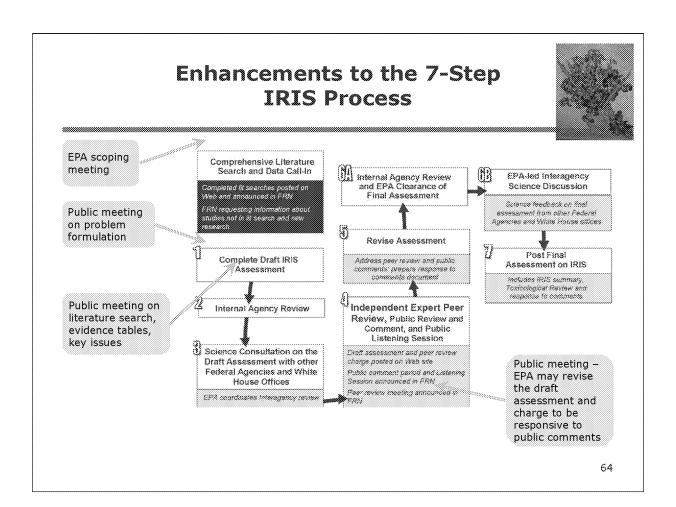
- Assessments are becoming clear, concise, and systematic
- IRIS is committed to early public engagement
- 2-3 opportunities for public engagement before peer review
- Frequent scientific workshops

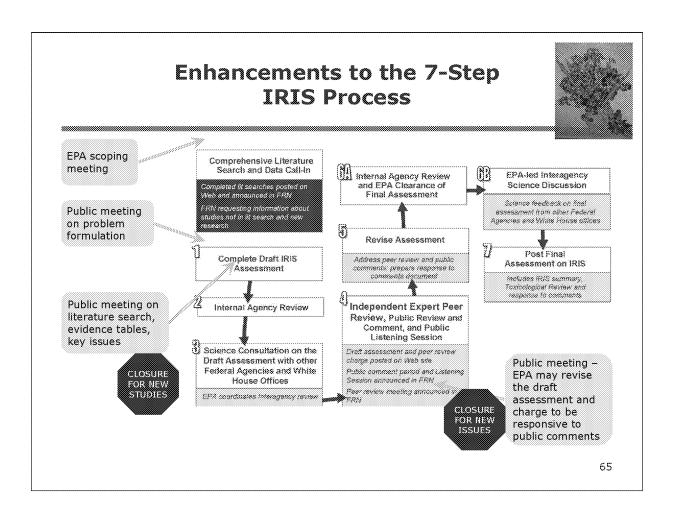
Increased productivity

A major challenge for 2014-2015 will be to complete more assessments in less time

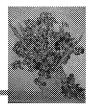
IRIS will continue to evolve as we receive public input and peer review advice – Thank you!







Peer Review Will Be More Robust



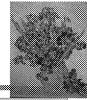
- There is a new Science Advisory Board committee
 the Chemical Assessment Advisory Committee
 dedicated to reviewing IRIS assessments
- EPA has also strengthened its process for contractor-managed peer review to better address conflicts of interests

Summary: IRIS is Changing for the Better



	7-Step Process Enhancements	
Improved science		V
Improved productivity		
Increased transparency		
		67

Comparison of Old and New **Document Structures**

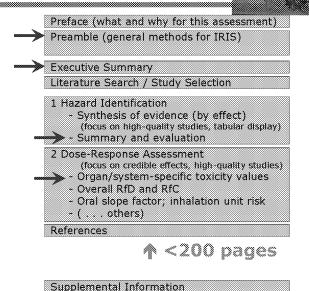


68

1	Introduction
2	Chemical and Physical Information
3	Toxicokinetics
4	Hazard Identification
	(study-by-study summaries written in paragraphs)
	4.1 Human studies
	4.2 Subchronic and chronic animal studies and cancer bioassays

- 4.3 Reproductive and developmental studies
- 4.4 Other duration-or-endpoint-specific studies
- 4.5 Mechanistic data and other studies
- 4.6 Synthesis of major noncancer effects
- 4.7 Evaluation of carcinogenicity 4.8 Susceptible populations and lifestages
- 5 Dose-Response Assessments (focus on most sensitive toxicity value)
 - Overall RfD and RfC - Oral slope factor; inhalation unit risk
- 6 Major Conclusions
 - 6.1 Human hazard potential
 - 6.2 Dose response

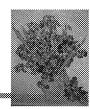
References

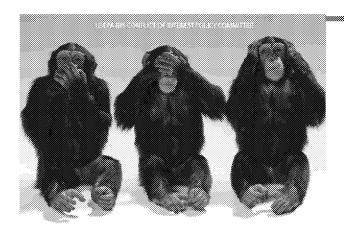


- Toxicokinetics and models

Dose-response models

← could be >1000 pages

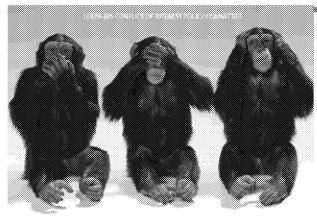




http://www.wolfenotes.com/2012/03/epa-caves-in-to-chemical-industry-pressure-on-chromium-drinking-water-standard/

6 Mar 2012





http://www.wolfenotes.com/2012/03/epa-caves-in-to-chemical-industry-pressure-on-chromium-drinking-water-standard/

6 Mar 2012

In May 2013 the changes I implemented at IARC were adapted as a model for peer review panels across the EPA.